## 510 (k) Summary Safety and Effectiveness

This summary of safety and effectiveness information has been prepared in accordance with the requirements of SMDA 1990 and 21 CFR Part 807.92.

Name:

Diagnostic Products Corporation

Address:

5700 West 96th Street

Los Angeles, California 90045-5597

**Telephone Number:** Facsimile Number:

(310) 645-8200

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(310) 645-9999

**Contact Person:** 

Edward M. Levine, Ph.D.

Director of Clinical Affairs

**Date of Preparation:** 

November 4, 1998

**Device Name**:

Trade:

AlaSTAT Microplate Mixed Allergen Panels:

AlaSTAT Microplate Food Panel 5 AlaSTAT Microplate Food Panel 6 AlaSTAT Microplate Food Panel 7 AlaSTAT Microplate Dust Panel 1 AlaSTAT Microplate Grass Panel 2 AlaSTAT Microplate Grass Panel 3

Catalog Number:

FP5M, FP6M, FP7M, HP1M, GP2M and GP3M

CFR:

A radioallergosorbent test system is a device system that consists of the reagents used to measure by immunochemical techniques the allergen antibodies (antibodies which cause an allergic reaction specific for a given allergen. Measurement of specific allergen antibodies may aid the diagnosis of asthma,

allergies and other pulmonary disorders.

Common:

Allergen Panels for the detection of Allergen-Specific IgE in the AlaSTAT Microplate Allergen-

Specific IgE System.

**Classification:** 

Class II device, 82-DHB (CFR 866.5750)

**CLIA Complexity Category:** 

High, based on previous classification of

analogous tests.

Manufacturer: Diagnostic Products Corporation

5700 West 96th Street

Los Angeles, California 90045-5597

**Establishment Registration Number:** DPC's Registration Number is 2017183

Substantially Equivalent

Predicate Devices: AlaSTAT Microplate Allergen-Specific IgE

**Description of Devices:** The AlaSTAT Microplate Mixed Allergen Panels

are clinical devices used for detection of IgE antibodies to specific allergens in serum.

#### **Intended Use of the Devices:**

AlaSTAT Microplate Allergen-Specific IgE is a kinetic enzyme immunometric assay system designed for the measurement of allergen-specific IgE in serum. It is intended strictly for *in vitro* diagnostic use as an aid in the clinical diagnosis of IgE-mediated allergic disorders.

# Summary and Explanation of the test:

Many allergies are mediated by immunoglobulins of the IgE class. In sensitized individuals suffering from this immediate (atopic or anaphylactic) type of allergy, IgE molecules act as points of contact between the allergen and specialized cells that release histamine and other agents upon exposure to the allergen; this initiates the events which we recognize as allergic reactions. When evaluated in the light of other clinical and laboratory findings, *in vitro* allergenspecific IgE tests can help the physician identify the allergen (or allergens) to which an individual is sensitive.

#### Performance Equivalence- Technology Comparison:

The AlaSTAT Microplate Mixed Allergen Panels use exactly the same technology used in the AlaSTAT Microplate Allergen-Specific IgE assays.

The AlaSTAT Microplate Allergen-Specific IgE (and therefore the Mixed Allergen Panels) is a liquid-phase immuno-enzymometric assay in a microplate format for the detection of circulating allergen-specific IgE antibodies. The specific allergens are covalently attached to a soluble polymer/copolymer matrix, thus permitting optimum presentation of the determinants to circulating IgE antibodies. Both the Specific Allergen Modules (predicate device) and the Mixed Allergen Panels (510k device submitted) for AlaSTAT Microplate Allergen-Specific IgE allergy tests are performed in the same manner as all other AlaSTAT Microplate Allergen-Specific IgE tests. Test results are given in both kilo-Units per liter (kU/L) and as a Class number.

Use of the AlaSTAT Microplate Allergen-Specific IgE System offers benefits to both the patient and the laboratory. The liquid phase kinetics allows for a more rapid assay and decreases the

## Performance Equivalence- Technology Comparison (continued):

probability that steric hindrance will interfere with proper allergen-IgE binding. In addition, the liquid feature of the AlaSTAT Microplate Allergen-Specific IgE System enables exact titering unlike allergens bound to solid surfaces, for which incremental adjustments are not possible. This allows for improved inter-lot precision. The liquid feature also eliminates variability introduced by the solid support itself.

The AlaSTAT Microplate Allergen-Specific IgE System offers patient benefits due to an additional technological difference from allergosorbent type assays. The chemistry of coupling of allergens to the ImmunoCAP necessitates the presence of an amino functional group (NH2) in the chemical structure of the allergen. Coupling to the ImmunoCAP is always through the amino group which is not present in certain allergens. Proteins also contain other functional groups such as hydroxyl groups (OH), thiol groups (SH), and carboxyl groups (COOH). These functional groups are not directly available for coupling in the allergosorbent type of assay, but are available for coupling in the AlaSTAT Microplate Allergen-Specific IgE System. These facts have important implications for the performance of the assay.

First, coupling of the allergen to the support in the allergosorbent type assay necessitates either direct bonding of the amino group to the solid surface or a modification of the allergen so that it may be bound to the solid surface. Either possibility may result in interference in the recognition of the allergen by the allergen-specific antibody. In addition, allergens are often carbohydrates which do not contain amino groups. Carbohydrate allergens can only be directly coupled to paper disc surfaces if the carbohydrate is bound to protein. This, in effect, restricts the ability to detect carbohydrate allergens in the allergosorbent type assay. In the AlaSTAT Microplate Allergen-Specific IgE System, carbohydrates may be coupled via their hydroxyl groups so that allergens may be available for recognition which are not available in any allergosorbent type By coupling allergens through a combination of functional groups in the AlaSTAT Microplate Allergen-Specific IgE System, the user can be assured that all antigens in an allergen extract are presented to the antibody in multiple conformations, increasing the likelihood that proper recognition and binding will take place. Thus, a false positive result (when compared with an allergosorbent type assay) may actually represent the detection of true allergen-specific IgE not detectable by allergosorbent type assays. This represents a benefit to the patient not afforded by other existing technologies.

Finally, the AlaSTAT Microplate Allergen-Specific IgE System increases the potential number of immunocomplexes that can be immobilized on a solid support since only a few ligands need to be attached to the ligand matrix in order to affect complete immobilization of the entire immunocomplex. This results in a greater possible signal generated per binding site on the plate. In addition, many sterically unrestricted allergen molecules are available for binding by specific IgE in close physical proximity to one another, thus making the allergen-IgE binding a more efficient process. Together these and other factors result in the requirement for less allergen per assay than a disc-based assay (provided equipotent allergen extracts are available). Thus, the quantity of allergen present in each assay is not comparable to the amount of allergen present on atypical allergosorbent disc or other solid phase support.

#### Performance Equivalence-Method Comparison:

The clinical performance of the AlaSTAT Microplate Mixed Allergen Panels was demonstrated in the comparisons of the test results of the AlaSTAT Microplate Mixed Allergen Panels with the AlaSTAT Microplate Allergen-Specific IgE System.

## Food Panel #5 (FP5M) vs. Specific Allergens (F1M, F2M, F3M, F4M, F13M, F14M)

	FP5M			N	63
Specific	Pos	29	5	Agreement	92.1%
Allergens	Neg	0	29	Rel. Sens.	85.3%
	_	Pos	Neg	Rel. Spec.	100.0%

95% Confidence Limits for Relative Sensitivity and Specificity: 68.9% - 95.1% and 88.1% - 100%, respectively

#### Food Panel #6 (FP6M) vs. Specific Allergens (F4M, F9M, F10M, F11M, F14M)

		FP	P6M	N	34
Specific	Pos	20	1	Agreement	97.1%
Allergens	Neg	0	13	Rel. Sens.	95.2%
		Pos	Neg	Rel. Spec.	100.0%

95% Confidence Limits for Relative Sensitivity and Specificity: 76.2% - 99.9% and 75.3% - 100%, respectively

# Food Panel #7 (FP7M) vs. Specific Allergens (F1M, F2M, F4M, F9M, F13M, F14M)

	FP7M			N	36
Specific	Pos	20	1	Agreement	97.2%
Allergens	Neg	0	15	Rel. Sens.	95.2%
	_	Pos	Neg	Rel. Spec.	100.0%

95% Confidence Limits for Relative Sensitivity and Specificity: 76.2% - 99.9% and 78.2% - 100%, respectively

## Grass Panel #2 (GP2M) vs. Specific Allergens (G2M, G5M, G6M, G8M, G10M, G17M)

	GP2M			N	39
Specific	Pos	26	2	Agreement	94.9%
Allergens	Neg	0	11	Rel. Sens.	92.9%
		Pos	Neg	Rel. Spec.	100.0%

95% Confidence Limits for Relative Sensitivity and Specificity: 76.6% - 99.1% and 71.5% - 100%, respectively

#### Grass Panel #3 (GP3M) vs. Specific Allergens (G1M, G5M, G6M, G12M, G13M)

	GP3M			N	31
Specific	Pos	18	0	Agreement	96.8%
Allergens	Neg	1	12	Rel. Sens.	100.0%
	-	Pos	Nea	Rel. Spec.	92.3%

95% Confidence Limits for Relative Sensitivity and Specificity: 81.5% - 100% and 64% - 99.8%, respectively

## Dust Panel #1 (HP1M) vs. Specific Allergens (H1M, D1M, D2M, I6M)

		HP1 <b>M</b>		N	32
Specific	Pos	17	1	Agreement	96.9%
Allergens	Neg	0	14	Rel. Sens.	94.4%
		Pos	Neg	Rel. Spec.	100.0%

95% Confidence Limits for Relative Sensitivity and Specificity: 72.7% - 99.9% and 76.8% - 100%, respectively

The studies support the conclusion that the AlaSTAT Microplate Mixed Allergen Panels are as safe and effective as the predicate device.

#### **Conclusion:**

The information presented in this summary of safety and effectiveness is the information that the Food and Drug Administration used in granting DPC substantial equivalence for the AlaSTAT Microplate Mixed Allergen Panels.

Edward M. Levine, Ph.D.

Director of Clinical Affairs

Date

#### **DEPARTMENT OF HEALTH & HUMAN SERVICES**

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Edward M. Levine, Ph.D.

Director of Clinical Affairs

Diagnostic Products Corporation

5700 West 96<sup>th</sup> Street

Los Angeles, California 90045-5597

Food and Drug Administration 2098 Gaither Road Rockville MD 20850

Re: K983954

Trade Name: AlaSTAT Microplate Mixed Allergen Panels:

AlaSTAT Microplate Food Panel 5
AlaSTAT Microplate Food Panel 6
AlaSTAT Microplate Food Panel 7
AlaSTAT Microplate Dust Panel 1
AlaSTAT Microplate Grass Panel 2
AlaSTAT Microplate Grass Panel 3

Regulatory Class: II Product Code: DHB

Dated: November 4, 1998 Received: November 5, 1998

Dear Dr. Levine:

We have reviewed your Section 510(k) notification of intent to market the device referenced above and we have determined the device is substantially equivalent (for the indications for use stated in the enclosure) to legally marketed predicate devices marketed in interstate commerce prior to May 28, 1976, the enactment date of the Medical Device Amendments, or to devices that have been reclassified in accordance with the provisions of the Federal Food, Drug, and Cosmetic Act (Act). You may, therefore, market the device, subject to the general controls provisions of the Act. The general controls provisions of the Act include requirements for annual registration, listing of devices, good manufacturing practice, labeling, and prohibitions against misbranding and adulteration.

If your device is classified (see above) into either class II (Special Controls) or class III (Premarket Approval), it may be subject to such Existing major regulations affecting your device additional controls. can be found in the Code of Federal Regulations, Title 21, Parts 800 to 895. A substantially equivalent determination assumes compliance with the Current Good Manufacturing Practice requirements, as set forth in the Quality System Regulation (QS) for Medical Devices: General regulation (21 CFR Part 820) and that, through periodic QS inspections, the Food and Drug Administration (FDA) will verify such assumptions. Failure to comply with the GMP regulation may result in regulatory action. In addition, FDA may publish further announcements concerning your device in the Federal Register. Please note: response to your premarket notification submission does not affect any obligation you might have under sections 531 through 542 of the Act for devices under the Electronic Product Radiation Control provisions, or other Federal laws or regulations.

This letter will allow you to begin marketing your device as described in your 510(k) premarket notification. The FDA finding of substantial equivalence of your device to a legally marketed predicate device results in a classification for your device and thus, permits your device to proceed to the market.

If you desire specific advice for your device on our labeling regulation (21 CFR Part 801 and additionally 809.10 for in vitro diagnostic devices), please contact the Office of Compliance at (301) 594-4588. Additionally, for questions on the promotion and advertising of your device, please contact the Office of Compliance at (301) 594-4639. Also, please note the regulation entitled, "Misbranding by reference to premarket notification" (21 CFR 807.97). Other general information on your responsibilities under the Act may be obtained from the Division of Small Manufacturers Assistance, at its toll-free number (800) 638-2041 or (301) 443-6597, or at its internet address "http://www.fda.gov/cdrh/dsma/dsmamain.html".

Sincerely yours,

Steven Butman

Steven I. Gutman, M.D., M.B.A.
Director
Division of Clinical
Laboratory Devices
Office of Device Evaluation
Center for Devices and
Radiological Health

Enclosure

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(	510(k) Number (if known): <u>K983954</u> Device Name: AlaSTAT Microplate Mixed Allergen Panels
	Indications For Use:
•	AlaSTAT Microplate Allergen-Specific IgE is a kinetic enzyme immunometric assay system designed for the measurement of allergen-specific IgE in serum. It is intended strictly for <i>in vitro</i> diagnostic use as an aid in the clinical diagnosis of IgE-mediated allergic disorders.
	(PLEASE DO NOT WRITE BELOW THIS LINE - CONTINUE ON ANOTHER PAGE IF NEEDED)
	Concurrence of CDRH, Office of Device Evaluation (ODE)
	(D) Stort Sign-Off) Dr. v. or Clinical Laboratory Devices 14913954 510(k) Number
	Prescription Use OR Over-The-Counter Use (Per 21 CFR 801.109)
	96) (Optional Format 1-2-